

**REMARKS**

Claims 1, 4-8, 11-15, 19-20 are all the claims pending in the application.

**I. Claim Rejections – 35 USC §102**

The Examiner rejected claims 1, 4-8, 11-15 and 19-20 under 35 USC 102(e) as being anticipated by Coss et al., United States Patent 6,098,172 (hereinafter “Coss”). The Applicant respectfully traverses the rejections, and submits that Coss fails to disclose each and every element of the claimed invention, as required to maintain a 102(e) rejection.

**Claim 1**

The Applicant submits that Coss fails to disclose the element of claim 1 of “selecting at least one of the presorted plurality of rules according to said one value retrieved from the received packet, wherein the selected rule is associated with said one value.” Coss discloses security policies represented by sets of rules (Col. 4, lines 17-18), but Coss does not disclose the selection of a presorted plurality of rules based on a value retrieved from the received packet, as described in claim 1. The Examiner cites to Col. 9, lines 1-33 of Coss to support the rejection of this element of claim 1, but this section of Coss merely refers to the use of dynamic rules which are added to the sets of rules “as a need arises.” *Coss*, col. 9, line 2. The discussion of dynamic rules in Coss does not disclose where a plurality of rules are selected according to a value retrieved from the received packet, nor does the cited section of Coss even discuss characteristics of the received packet. Therefore, the Applicant submits that Coss fails to describe the element

of claim 1 of “selecting at least one of the presorted plurality of rules according to said one value retrieved from the received packet, wherein the selected rule is associated with said one value.”

The Applicant also submits that Coss fails to disclose the element of claim 1 of “analyzing information in the packet to retrieve from the received packet one of said values.” The Examiner cites to Col. 9, lines 1-33 of Coss, which does not discuss packets or analysis of packets to obtain a value, but instead discusses the use of dynamic rules to be added to a standard set of access rules. As Coss fails to disclose the analysis of information in a packet to retrieve one of said values, the Applicant submits that Coss fails to disclose each and every element of claim 1.

For at least the reasons stated above, the Applicant believes that Coss fails to disclose each and every element of claim 1, and therefore respectfully requests that the rejection under 35 USC §102(e) be withdrawn.

#### Claim 4

The Applicant refers the Examiner to the arguments presented above regarding claim 1, and submits that claim 4 is allowable at least based on its dependency to claim 1.

#### Claim 5

The Applicant submits that Coss fails to disclose the elements of claim 5, as Coss does not describe associating a user with each value such that each user is assigned a privilege, and wherein the privilege determines whether to associate each rule with said value. The Examiner cites to col. 1, lines 63-67, col. 2, lines 38-41, and col. 8, lines 3-35 of Coss as disclosing the elements of claim 5. However, col. 1, lines 63-67 merely discusses that the firewall can support

“multiple users,” without describing the type of support or capabilities provided. Col. 2, lines 38-41 describe the use of dynamic rules to define a host group, which contrasts with the presorted rules of the claimed invention and the assigning of a privilege to a user. Col. 8, lines 3-35 discusses a dependency mask, where a rule includes a condition (or mask) that allows a connection back to a user. However, none of the cited sections of Coss describe associating a user with a value to assign a privilege to a user and then determine whether to associate each rules with said value according to the privilege. As such, the Applicant submits that Coss fails to disclose each and every element of claim 5.

#### Claim 6

For the same reasons stated above with regard to claim 5, the Applicant submits that Coss similarly fails to disclose determining a user profile of associated rules based on the privileges assigned to a user. The Examiner cites to the same sections of Coss as with the rejection of claim 5, which, as the Applicant has already pointed out, do not disclose the specific elements of claim 5, such as assigning a privilege to a user. In addition, Coss fails to disclose determining a user profile of associated rules according to at least one privilege, as described in claim 6.

#### Claim 7

The Applicant additionally submits that Coss fails to disclose the elements of claim 7, as Coss does not disclose further associating a user profile with a group profile, as set forth in claim 7. For the reasons stated above, and at least based on its dependency to claim 1, the Applicant submits that claim 7 is allowable over the cited art.

Claims 8, 11, 15 and 19

The Applicant refers the Examiner to the arguments presented above regarding claim 1, and submits that claims 8, 11, 15 and 19 are allowable for at least the same reasons.

Furthermore, the Applicant submits that Coss also does not disclose a computer program product as described in claim 15. No portion of Coss teaches or provides motivation for the embodiment of the system into a computer program product, as described in claims, 15, 19 and 20.

Claim 12-14 and 20

The Applicant refers the Examiner to the arguments presented above regarding claim 5, and submits that claims 12-14 and 20 are allowable for at least the same reasons.

## **II. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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